

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No. 1:20-cv-00954-WO-JLW

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and  
VITAL MANAGEMENT SERVICES,  
INC.,

Defendants.

**DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT AND  
REQUEST FOR ORAL  
ARGUMENT**

**Fed. R. Civ. P. 56**

**INDEX OF EXHIBITS**

<b><u>Exhibit</u></b>	<b><u>Document</u></b>
A	Plaintiff's Third Supplemental Responses to Defendants' First Set of Interrogatories
B	Composite Exhibit – Thumb Drive of Plaintiff's Trade Secrets Documents (manually submitted under seal)
C	Plaintiff's Second Supplemental Responses to Defendants' First Set of Interrogatories
D	Deposition Transcript of ALG Transportation, Inc.
E	Plaintiff's Expert Report of Christopher Tarbell and Exhibits Attached Thereto– May 24, 2024
F	Deposition Transcript of Farhad Azima and Exhibit 1C Attached Thereto
G	Excerpts of Deposition Transcript of Ray Adams

H	Plaintiff's Expert Report of Christopher W. Tarbell and Exhibits Attached Thereto – August 30, 2019
I	Declaration of Lee Whitfield and Expert Report
J	Plaintiff's Supplement to Expert Report of Christopher Tarbell – June 28, 2024
K	Excerpts of Deposition Transcript of Christopher Tarbell
L	Declaration of Justin Kaplan and Exhibits Attached Thereto
M	Illustrative Chart of Plaintiff's Trade Secrets' Deficiencies
N	Declaration of Charles Clowdis and Expert Report
O	Excerpts of Deposition Transcript of Jimmy Pappas
P	Expert Report of Jimmy Pappas – Filed Without Exhibits